	A	B	C	D	E	F	L	M
1	**Name**	**Affliation**	**Date Received**	**Comment Code**	**Summary Main Comments**	**Pg. #**	**Category of Comment**	**Notes**
31	(b) (6)	citizen	3/19/14	**32-A**	· Supports disapproval. Echoes Beyond Toxic's letter: http://www.beyondtoxics.org/wp-content/uploads/2014/03/CZARA_BeyondToxicsFindings2014March18.pdf	1		
60				**46-C**	State is not doing enough to prevent polluted runoff from forestry--especially related totimber harvesting and riparian protection (fish and nonfish-bearing streams and for pesticide application).	2	Program – Type “F” Buffers; Program - Type "N" Buffers	
61				**46-D**	Concerned about chemical use and its impacts on neighboring property. Cites example of husband experiencing side effects and environmental impacts from nearby pesticide use and contamination of domestic water supplies. Need to do more than just adhere to label requirements--that shouldn't be all that is legally required for industry to meet.	5	Program - General	
62				**46-E**	Asked ODF to notify about pesticide use, then were not notified.	5	Program – Notification	
63				**46-G**	OR needs to protect surface drinking water in Deer Creek Watershed…critical source of water for residents. Keeping aquifers free of toxic chemicals are critical for providing and protecting water for the entire community of the Deer Creek watershed.	6	Health – drinking water	
64				**46-I**	Ever growing concern by residents in the Illinois Valley about the use of ODF approved pesticides on forestlands and damages being done to neighboring small organic farmers, vineyard owners, natural forest land owner/practitioners and other community members.	1	Env – Drift (e.g., impacts to non-drinking water)	
65				**46-J**	It appears that little is understood by chemical users of the impacts these chemicals have on their neighbors, adjoining watersheds and the larger community. It seems taken for granted that the laest and instructions of the chemical company is all they need to consider, because that is the legal requirement. The ODF and legal system supports use of harmful chemicals.	2	Legal - Other	
66				**46-K**	Claims to have visited a doctor who believes Orville's liver and health issues are the result of toxic exposure and agrees that adjacent land pesticides use makes sense. Many costs to family.	5	Health – Chemical Effects (e.g., synergistic, unknown, revolatilization)	
67				**46-L**	impacts to their land from adjacent chemical use far exceeed value of timber cut on adjacent land	5	Program – Other	
68				**46-M**	Over past years we have been living under constant fear of what toxic chemicals sprayed into the headwaters of our land and water collections systems would mean to our family and community and environment.	6	Program - General	
69				**46-N**	Ample proof that these chemicals are toxic and violating basic human rights. Imperative that immediate changes are made to Oregon's pesticide spray laws, regulations, policies and rules. We need stronger federal oversight and protection.	7	Program - General	
70				**46-O**	These chemicals do not know property lines. They outgas for years as they decompose. Reside in soil in degraded forms which can be more toxic than the initial compound	7	Env – Other	
71	(b) (6)	citizen	3/20/14	**46-P**	We have a right to know what are in the chemical compounds, including the inerts. Right to know what is in our air and water and may be causing health conditions such as liver disease, cancer, auto immune and reproductive illnesses. Changing our own and children's DNA.	7	Legal - Other	

Comment Code PROGRAM-GENERAL	Summary Main Comments	Pg. #	Category of Comment
2-B	Disapproval will hopefully help improve situation in OR and break up political log-jam so toxics can be addressed appropriately.	1	Program-general
30-T	Based on above two points, doesn't see how NOAA/EPA can find that OR provides sufficient protection to fish-bearing streams.	5	Program - general
31-D	· Timber companies are unaccountable for overuse of pesticides, landslides caused by poorly maintained logging roads, and increased sediment load in our rivers which inhibit salmon spawning ability.	1	Program-General
38-A	There is excessive and indiscriminate use of toxic chemical poisons in land management, including agriculture and tree farms.	1	Program - general
38-B	We need better oversight and management of the use of toxics.		Program - general
40-C	Attempting to relocate during spray/burn events causes financial hardship and spray/burn permits can last for months. Owners are given no warning when activities will occur. Property values are lowered and no one would buy home if tried to sell due to publicity of harmful forestry activities in area.	2	Program - general; Program - notification
41-A	Supports disapproval and Lisa Arkin's (Beyond Toxics) letter	1	Program - general
45-B	Large industry (forestry roads and spraying) is impacting water quality. OR needs laws to protect water quality. Need to use CNP to improve these issues and laws to provide better oversight.	1	Program - general
45-C	Large companies and large landholdings are doing a large amount of activities [massive aerial spraying] that impact us all. These activities require oversight from laws that effectively reign in pollution released into our waterways.	1	Program - general
46-D	Concerned about chemical use and its impacts on neighboring property. Cites example of husband experiencing side effects and environmental impacts from nearby pesticide use and contamination of domestic water supplies. Need to do more than just adhear to label requirements--that shouldn't be all that is legally required for industry to meet.	5	Program - General
46-M	Over past years we have been living under constant fear of what toxic chemicals sprayed into the headwaters of our land and water collections systems would mean to our family and community and environment.	6	Program - General
46-N	Ample proof that these chemicals are toxic and violating basic human rights. Imperative that immediate changes are made to Oregon's pesticide spray laws, regulations, policies and rules. We need stronger federal oversight and protection.	7	Program - General
49-H	OR doesn't have programs in place to protect streams/fish from polluted runoff from pesticide use on forest land or monitor pesticide use and impacts.	1	Program - general; Program - monitoring
50-B	There is aerial spraying on Oregon's private forests that get in the waters and has also harmed rural residents and their animals and organic farming … we must take strong stands to protect the people and the surrounding environment.	1	Program - general
54-B	OR needs improved pesticides application restrictions and protections for all classes of streams in both forestry and agricultural areas. Additionally, we encourage EPA and NOAA to require even greater pesticide protection standards for all land use areas within the Oregon Coastal Zone to prevent many of the unmonitored dangers that these chemicals pose to humans and aquatic species, like salmon.	1	Program - General; Env - Fish toxicity; Health - general
54-D	Oregon's pesticide laws, forestry management laws, clean water laws, and its implementing regulatory programs fail to adequately protect coastal zone resources and the people living within the coastal zone from the dangers of the increasing use of pesticides across all land uses and activities, but especially in the activities of forestry and agriculture. In the Oregon Coastal Zone, neither FIFRA, nor state pesticides, agricultural, or forestry laws adequately protect or account for these known risks.	3	Program - General; Env - Fish toxicity; Health - general
54-E	Although NOAA/EPA found Oregon's state-level frameworks and actions to address pesticide water quality controls sufficient and even commendable because of their monitoring mandates and multi-agency management team, none of these pilot monitoring programs are occuring in the coastal zone.	3	Program-General; Program-Monitoring

54-G1	Documented in a recent report, Oregon's Industrial Forests and Herbicide Use: A Case Study of Risk to People, Drinking Water and Salmon, private forestry operations in Oregon operate under antiquated and loose regulations, allowing aerial spraying and unmonitored applications of pesticides as compared to their federal forestry operation and border-state counterparts.	6	Program-General; Program-Monitoring
55-M	Analysis of pesticide application records in the Triangle Lake area west of Eugene shows that in the study area, more than 20 tons of pesticide products were applied in just a three-year period.	5	Program-General (Triangle Lake)
55-Q	Without requirements for a riparian leave zone, there is no possibility for limiting the amount of pesticide reaching such small streams. A mandated spray buffer would provide some protection for these small streams, but a vegetated riparian zone would provide much better protection because it would allow some filtration of pesticides running off the hillside.	6	Program - General - Need Mandatory Buffers and Vegetated Riparian Zone
58-F	Oregon needs greater controls on spraying chemicals such as pesticides and herbicides in coastal watersheds, especially near streams.	6	Program - General, Program - Type N&F Buffers
69-F	Pesticides may be aerially sprayed in Oregon despite lack of understanding of the effects of pesticide drift, persistence, and run-off during rains.	3	Program - General
70-H	State doesn't have a program to protect groundwater/drinking water.	4	Health - Drinking Water, Program General
85-C	In my 45 years in coastal, Umpqua, and Rogue watersheds I have witnessed enormous environmental degradation, pollution and poisoning occuring as a direct result of Oregon's Forest Practice Laws, Right to Forest Laws (ORS 30.930-30.947) and the Pesticide Preemption Laws (ORS 636.057).	1	Program - General
85-D	Coastal watersheds are impaired due to state govn't corruption and control by forest and chemical industry. Cites 2 examples of how EPA has gotten involved with two problems in OR (OR Health Authority's Hwy 36 investigation and Curry County airial spraying poisoning)	2	Program - General
85-G	State-sponsored liability-free chemical applications are rationalized as labor-saving.	1	Program - General
PROGRAM-MONITORING			
27-B	There is no program that monitors private forestland clear-cuts, or spray and burn operations	1	Program -Monitoring
27-C	· Need preventive measures to assure that forestry operations near Clear Lake won't make water undrinkable (get drinking water from lake and has observed small-lot foresters aerial and hand spraying pesticides/herbicides near lake.	1	Program-Monitoring, Health-Drinking Water
27-D	How often testing should be done and how much will it cost?		Program Monitoring; comment not relevant to CZARA decision
28-D	· No pesticide mngt measures are in use in ag. lands.	1	Programs-State Programs
30-R	State's failure to monitor water quality after spraying ensures that need for better buffers and laws won't occur.	4	Program - monitoring
42-G	No coordination between DEQ/ODF to conduct pesticide monitoring in timely manner and community is given no warning of spraying.	2	Program-Monitoring, Program-Spray
42- N	York Johnson, North Coast Basin Coordinator ODEQ, agreed with concern about aerial spraying of the watershed, but indicated there was insufficient funding to test for water contamination in that water source, and no way to coordinate with the timber company..	Att. P.3	Program - monitoring
42-O	ODEQ lab presently does not have capacity to test for Glyphosate, which is found in Accort XRT II, but working on a solution.	Att. P.4	Program - monitoring
42-T	It would seem logical and prudent ot err on the side of caution regarding the use of these chemicals, since there are possible unknown health effects on people and other living beings. Also there is no testing for soil contamination during spraying.	Att. P.4	Health - chemical effects; Program - monitoring

48-H	ODF/DEQ don't have regular testing protocols for pesticides after sprays.	2	Program - Monitoring
48-L	There is no regular testing protocol for herbicides		Program -Monitoring
49-H	OR doesn't have programs in place to protect streams/fish from polluted runoff from pesticide use on forest land or monitor pesticide use and impacts.	1	Program - general; Program - monitoring
53-H	DOH only requires inspection of community drinking water for organic toxics every 3 yrs. Needs to be changed so that there is on site real time monitoring during applications of herbicide to assure no contamination of streams and wetlands in the watershed. Water samples need to be taken within hours of the spraying to verify that none of the chemicals have contaminated the streams.	2	Program – Monitoring
53-I	Currently the monitoring of spraying operations and testing of waters immediately after the spraying is essentially non-existent.	2	Program – Monitoring
54-E	Although NOAA/EPA found Oregon's state-level frameworks and actions to address pesticide water quality controls sufficient and even commendable because of their monitoring mandates and multi-agency management team, none of these pilot monitoring programs are occuring in the coastal zone.	3	Program-General; Program-Monitoring
54-F	EPA and NOAA improperly assume that, should riparian buffer standards for type N streams and monitoring programs within the coastal zone adhere to existing state laws and programs concerning water quality and pesticides, then Oregon's CNPCP would warrant approval. We disagree because existing state and federal laws fail to address large swaths of the pesticide application activities and fail to collect critical pesticide application and risk data.	3	Program - Type "N"; Program - Monitoring; Program - Spray Records
54-G1	Documented in a recent report, Oregon's Industrial Forests and Herbicide Use: A Case Study of Risk to People, Drinking Water and Salmon, private forestry operations in Oregon operate under antiquated and loose regulations, allowing aerial spraying and unmonitored applications of pesticides as compared to their federal forestry operation and border-state counterparts.	6	Program-General; Program-Monitoring
57-II	The federal agencies praise Oregon's Water Quality Pesticide Management Plan, which purportedly uses water monitoring data to drive so-called adaptive management actions, but the state does little monitoring of pesticides with which to make this work and there is no evidence it collects any data in coastal watersheds.	49	Program-Monitoring
57-II4	There is no evidence that the State's Pesticide Plan collects data on the coast	49	Program - Monitoring
62-C	Need more regular monitoring of drinking water for pesticides/herbicides; designated uses and water quality standards in coastal watersheds are not protected.	1	Program – Monitoring
62-F	I know our drinking water plants test SOCs every three years, how do you trend that?	3	Program – Monitoring
70-B	Our comments address the inadequacies of Oregon's existing program to implement the required CZARA management measures, its inability and disinterest in evaluating the sufficiency of those management measures to ensure pesticides do not violate Oregon's water quality standards and impair its designated uses, its lack of a monitoring program to support such an evaluation, and its lack of practices that protect those designated uses.	1	Program - State Programs, Program monitoring, Env-General
70-C	Beyond Toxics report on pesticide/herbicide use in forestry shows that FPA lacks any program to protect Oregon streams and their beneficial uses (see report attached). Requires no pesticide buffer on non-fish streams even though neighboring states (WA, ID) require 25ft buffers. In non-fish bearing streams, amphibians and crawfish are affected by pesticide application	2	Program - State Programs, Program monitoring, Env-General
70-F	Oregon has no program to determine the presence of forestry pesticides in the air and resulting in drift and deposition onto surface waters and soils.	3,4	Program Monitoring
70-J	Oregon must develop a research program to determine if aerial application of herbicides is necessary for timber production. Oregon needs additional management measures to protect uses and water quality from pesticide drift.	5	Program Monitoring - Research

77-T	ODF has developed extensive guidelines for implementing the Oregon Forest Practices Act rules for herbicide applications to forest lands. See Oregon Department of Forestry, Forest Practice Rule Guidance: Chemicals and Other Petroleum Products (2009), available at http://goo.gl/uv8oIH. Also cite pesticide monitoring studies that show no significant impact.	19	Program - Monitoring; Program - State Programs	

RAM-BUFFERS - Type N or Type F

28-B	· Very narrow or non-existent buffers along streams that flow into Siletz. Clear cut to banks and aerial spraying over cuts.	1	Program- Type N, Program- Type F	general buffer comment? general buffer comment? general buffer comment?
30-G	OR must increase buffers for the application of pesticides to both fish and non-fish bearing streams and take other actions to prevent pesticides from entering water that affects people, fish, and wildlife. Community watersheds are routinely exposed to the timber industry's aerial spraying of toxic pesticides.	3	Program - type N buffers; Program - type F buffers; Health - drinking water	
30-P	Oregon riparian buffers for pesticide use are woefully inadequate. Does not agree with EPA/NOAA that Oregon "may" have adequate stream buffers for pesticide use on streams with salmon but is encouraged that NOAA/EPA find that the state doesn't have good buffers on non-fish breaing streams. Most drinking water flows through non-fishbearing streams.	4	Program - type N buffers; Program - type F buffers; Health - drinking water	
30-R2	DEQ monitoring in Jetty Creek after spray was positive for glyphosate showing legal buffers aren't working.	4	Program - type N buffers; Program - type F buffers	
35-J	·NOAA/EPA need to require Oregon to provide not only a solid framework of basic management measures, but also a detailed and concrete list of additional management measures to actually protect riparian areas, and provide substantially increased protections for fertilizer, herbicide and pesticide applications near fish-bearing and non-fish bearing streams.	4	Program – Type "N" Buffers; Program – Type "F" Buffers	
46-C	State is not doing enough to prevent polluted runoff from forestry--especially related totimber harvesting and riparian protection (fish and nonfish-bearing streams and for pesticide application).	2	Program – Type "F" Buffers; Program - Type "N" Buffers	Program - other (schools, homes)
48-F	Drinking waters are surrounded by private forest land or are below forest operations. 20ft buffers on fish-bearing streams do not protect from sedimentation and pesticide/herbicide use.	2	Health -Drinking Water, Program - Type F Buffers	
54-F	EPA and NOAA improperly assume that, should riparian buffer standards for type N streams and monitoring programs within the coastal zone adhere to existing state laws and programs concerning water quality and pesticides, then Oregon's CNPCP would warrant approval. We disagree because existing state and federal laws fail to address large swaths of the pesticide application activities and fail to collect critical pesticide application and risk data.	3	Program - Type "N"; Program - Monitoring; Program - Spray Records	
54-G4	3) Aerial herbicide sprays regularly occur directly over headwaters and tributaries of protected salmon streams.	6	Program-Type N	
54-G5	4) Oregon permits pesticides to be sprayed with only the smallest protective buffer of 60 feet from salmon and steelhead streams—a buffer significantly smaller than other Northwest states with similar forest and river ecosystems.	6	Program - Type "F" Buffers; Program- Buffers N&F and mandatory riparian zone	
55-N	Supports Beyond Toxics Comments. Need mandatory spray buffers and vegetated riparian zone. Buffers around streams.			
55-0	ODF rules require no buffer on type N streams even if they are the headwaters of streams which provide habitat for fish, including endangered coho. Extensive pesticide applications blanket these small streams, allowing these dangerous compounds to move downstream of harvest areas to areas inhabitated by fish . When no buffer of any kind is required, it is obvious that pesticides get into these streams when the land on both sides of them, is sprayed.		Program - Type N	
55-Q	Without requirements for a riparian leave zone, there is no possibility for limiting the amount of pesticide reaching such small streams. A mandated spray buffer would provide some protection for these small streams, but a vegetated riparian zone would provide much better protection because it would allow some filtration of pesticides running off the hillside.	6	Program - General - Need Mandatory Buffers and Vegetated Riparian Zone	
56-E	NMFS recommeded buffers range from 150-300ft far above 20ft that OR has (only for fish-bearing).	3	Program - Type "F" Buffers	
56-F	Need larger spray buffers (may be better tha mulit-agency approach that attempts to monitor pesticide impacts).	3	Program - Type "F" Buffers; Type "N" Buffers	
57-II2	ODF Rules to protect fish-bearing sterams are inadequate to protect threatened and endangered species.	47	Program - Type "F" Streams	
57-CF-B	Many water bodies have no mandatory application buffer, so chemical may be sprayed to the water's edge, and some level of overspray, indirect drift and delivery by surface runoff by groundwater transport through soil macropores into adjacent waters is inevitable. These include headwater streams above fish barriers and small wetlands and ponds.	53	Env-drift; Program-Type "N" Buffer; Program-Type "F" Buffer; Env-General	
57-CF-C	Riparian retenion rules that allow extensive thinning on riparian standards to within 20' of the water's edge result in a riparian vegetative buffer that may be highly porous to aerial draft, rather than dense, unlogged riparian forest.	53	Program-Type "F" Buffer; Env-Drift	

58-F	Oregon needs greater controls on spraying chemicals such as pesticides and herbicides in coastal watersheds, especially near streams.	6	Program - General, Program - Type N&F Buffers	
69-C	Especially concerned about inadequate buffer for aerial spray pesticide application. Oregon has an inadequately small no-spray buffer zone around fish-bearing streams and no effective program to protect non-fish bearing streams.		Program – Type “N” Buffers	
69-G	Compared to neighboring states, Oregon has an inadequately small no-spray buffer zone around fish-bearing streams and no effective program to protect non-fish bearing streams.	3	Program – Type “N” Buffers; Program – Type “F” Buffers	
72-B	EPA & NOAA have found that Oregon forests have adequate stream buffers for pesticides on salmon bearing streams. How was this determined? Seasonal and non-fish bearing streams have not been considered. Isn't this the water that feeds the fish-bearing streams and rivers? Stream buffers and logging practices in this state are a joke--a sad joke. Observations, including photos of streamside vegetation, are evidence that Oregon is out of compliance; often with its own inadequate forest practices act. How did EPA find otherwise?	1	Program – Type “N” Buffers	

PROGRAM-STATE PROGRAMS

28-C	· Concerned about contamination of drinking water (Newport gets water from Siletz), fish and soil contamination from spraying. Criminal that state does not provide better protections..especially as rate of clear cutting/forestry activities increase due to increase in China exports.	1	Health-Drinking Water, Env-Fish, Programs-State Programs	comment not relevant to CZARA decision
28-D	· No pesticide mngt measures are in use in ag. lands.	1	Programs-State Programs	
30-S	Thinks NOAA/EPA are wrong for lauding Oregon’s Pesticide Stewardship Partnership Program when there are not pilots in coastal area.	4	Program - State programs	
54-G6	5) Stricter chemical and pesticide rules apply in neighboring states with heavy forestry industries.	6	Program-State Programs	
57-HH	Despite the lack of any additional ODA rules beyond the EPA pesticide labels, which have been demonstrated to be inadequate for protection of threatened coho, EPA and NOAA have not made any findings on the adequacy of Oregon's program to protect water quality and designated uses from pesticides applied to agricultural lands.	49	Program - State Program	
57-II3	There are no additional ODA rules other than EPA labels that agricultural applicators need to adhered to.	49	Program - State Program	
69-H	Verifiable management measures are needed to ensure that water quality is protected	3	Program – State Programs	
70-B	Our comments address the inadequacies of Oregon’s existing program to implement the required CZARA management measures, its inability and disinterest in evaluating the sufficiency of those management measures to ensure pesticides do not violate Oregon’s water quality standards and impair its designated uses, its lack of a monitoring program to support such an evaluation, and its lack of practices that protect those designated uses.	1	Program - State Programs, Program monitoring, Env-General	
70-C	Beyond Toxics report on pesticide/herbicide use in forestry shows that FPA lacks any program to protect Oregon streams and their beneficial uses (see report attached). Requires no pesticide buffer on non-fish streams even though neighboring states (WA, ID) require 25ft buffers. In non-fish bearing streams, amphibians and crawfish are affected by pesticide application	2	Program - State Programs, Program monitoring, Env-General	
70-I	The EPA should require ODF, in consultation with DEQ, to exercise their authority to review, comment, and require modifications of forest vegetation management written plans based on an environmental and water quality risk assessment and proof of compliance with state and federal laws.	4,5	Program -State Programs	

72-A	Member of the Upper Willamette & Upper Siuslaw Agricultural Water Quality Management Area Local Advisory Committees. Met annually since then with our state and local officials, the Oregon Department of Agriculture, the Department of Environmental Quality(DEQ), and East Lane (county) Soil and Water Conservation District to be advised on the current status of the management plan. The committee was instructed that our plan would be complaint driven, and compliance voluntary. I have been informed that three fines have been imposed over the last 11 years. We were also told we were not allowed to consider pesticides as a pollutant. The state still does not consider pesticides as pollutants, but considers streamside plantings to be sufficient to filter anything including pesticides. I am told they do not test the water for pesticides.	1	Program – State Programs
77-S	Since 1998 there have been significant changes in how chemicals are applied to forests under FIFRA. Findings from the Spray Drift Task Force and other research led to revisions in chemical labeling. Pesticide applicators are licensed under FIFRA and recent court rulings have further increased regulation of applicators and land owners. Oregon's Forest Practices Act rule guidelines state that applications must comply with the most stringent of requirements of either the label, or forest practice rules and guidelines.	19	Program - State Program; Program - FIFRA; Program - Enforcement; Program - Scope of Authority
77-T	ODF has developed extensive guidelines for implementing the Oregon Forest Practices Act rules for herbicide applications to forest lands. See Oregon Department of Forestry, Forest Practice Rule Guidance: Chemicals and Other Petroleum Products (2009), available at http://goo.gl/uv8oIH. Also cite pesticide monitoring studies that show no significant impact.	19	Program - Monitoring; Program - State Programs

PROGRAM-NOTIFICATION

40-C	Attempting to relocate during spray/burn events causes financial hardship and spray/burn permits can last for months. Owners are given no warning when activities will occur. Property values are lowered and no one would buy home if tried to sell due to publicity of harmful forestry activities in area.	2	Program - general; Program - notification
42-G	No coordination between DEQ/ODF to conduct pesticide monitoring in timely manner and community is given no warning of spraying.	2	Program-Monitoring; Program-notification
42-J	Sept. 16, 2012. observed aerial spraying taking place in their watershed, without warning. Applied MSO, Agsurf Sulfomet Extra Herbicide, and Accord XRT II ("industrial herbicide")	Att. P.3	Program - notification
42-K	ODF does not inform the public of the exact date of an activity such as aerial sprying nor which chemicals will actually be used.	Att. P.3	Program - notification
42-P	Notices were received about aerial spaying to occur in the next 6 months in the watershed by Olympic Resource Management and Stimson Lumber for numerous pesticides, but no specific dates provided.	Att. P.4	Program - notification
42-S	There is no official process in place to inform businesses and residents of upcoming spraying.	Att. P.4	Program - notification
46-E	Asked ODF to notify about pesticide use, then were not notified.	5	Program – Notification
48-G	Concerned about ODF's vague public notification requirements when spraying.	2	Program - Spray Notification
48-M	The Department of Forestry's notification of spray requirements are extremely vague.		Program - Notification
70-M	Pesticide application records are not available to the public. Spray records are kept by the applicator. Only the State Forester can request actual application records.	1	Program-Spray Revords; Program-Notification
85-I	The Oregon Health Authority's only protections are to inform the residents of Hwy 36 corridor that they and their watersheds will continue to be poisoned as usual, and that Oregon's spring poisoning season has already started.	2	Program – Notification

PROGRAM-FIFRA

30-S2	EPA has not revised its pesticide labels to reflect the restrictions NMFS said were necessary to protect ESA-listed salmon.	4	Program - FIFRA
70-K	Oregon has no program to determine if federal label laws are being complied with.	5	Program - FIFRA
70-L	Evidence suggests that federal label restrictions for Atrazine, an Oregon-regulated herbicide, are not being followed. Also, poor record-keeping on pesticide applications	6	Program - Enforcement, Program - FIFRA
70-M2	There may have been a violation of a 2004 court that required 300' buffers for pesticide application for 2,4-D.	12-15	Program - Enforcement, Program - FIFRA

70-N	FPA aerial and ground spray buffers are smaller than EPA legal requirements for atrazine. EPA labeling requires a 66' buffer for aerial and ground spray, but actual application followed state guidelines of 60' buffer on fish streams.	19-22	Program - FIFRA
77-S	Since 1998 there have been significant changes in how chemicals are applied to forests under FIFRA. Findings from the Spray Drift Task Force and other research led to revisions in chemical labeling. Pesticide applicators are licensed under FIFRA and recent court rulings have further increased regulation of applicators and land owners. Oregon's Forest Practices Act rule guidelines state that applications must comply with the most stringent of requirements of either the label, or forest practice rules and guidelines.	19	Program - State Program; Program - FIFRA; Program - Enforcement; Program - Scope of Authority

GRAM-SCOPE OF AUTHORITY

			Program – Scope of Authority
35-F	·Water District tried to prevent the spraying of fertilizers, herbicides and pesticides inside the Clear Lake watershed. The board was informed that there was nothing that could be done until it could be proven that something had actually harmed the water - after the spraying had been allowed. The District had to explain to customers that it has no power to prevent non-point pollution of Clear Lake, short of litigation after the fact.	3	
35-G	·The protection zone language for herbicide spraying was purposefully written by Lane County to be completely ineffective as far as application to logging operations inside the watershed, and minimal as to pollution from other human activities.	3	Program – Scope of Authority
77-S	Since 1998 there have been significant changes in how chemicals are applied to forests under FIFRA. Findings from the Spray Drift Task Force and other research led to revisions in chemical labeling. Pesticide applicators are licensed under FIFRA and recent court rulings have further increased regulation of applicators and land owners. Oregon's Forest Practices Act rule guidelines state that applications must comply with the most stringent of requirements of either the label, or forest practice rules and guidelines.	19	Program - State Program; Program - FIFRA; Program - Enforcement; Program - Scope of Authority

PROGRAM-SPRAY RECORDS

42-L	A five year history of pesticide use in the watershed was not available from ODF when requested.	Att. P.3	Program - spray records
54-F	EPA and NOAA improperly assume that, should riparian buffer standards for type N streams and monitoring programs within the coastal zone adhere to existing state laws and programs concerning water quality and pesticides, then Oregon's CNPCP would warrant approval. We disagree because existing state and federal laws fail to address large swaths of the pesticide application activities and fail to collect critical pesticide application and risk data.	3	Program - Type "N"; Program - Monitoring; Program - Spray Records
54-G7	6) Under the current administrative rules, the Oregon Forest Practices Act prohibits researchers, doctors and the public from obtaining accurate information about what types and quantities of herbicides are sprayed	6	Program-Spray Records
70-M	Pesticide application records are not available to the public. Spray records are kept by the applicator. Only the State Forester can request actual application records.	1	Program-Spray Records; Program-Notification

PROGRAM-OTHER

46-L	impacts to their land from adjacent chemical use far exceeed value of timber cut on adjacent land	5	Program – Other	Program - other (schools, homes)
54-G3	2) Oregon does not require a no-spray buffer near homes and schools.	6	Program - other;	
55-P	Assisted in developing the response for Beyond Toxics of Eugene in developing information for their comment letter. The comments show that current pesticide management resulted in extensive spraying over small, non-fish bearing streams, primarily headwaters of streams which provide habitat for endangered Coho.		Program - Other data shows impacts from spraying	Mtg water quality standards; call for additional mgmt measures

57-GG	Oregon's management measures for pesticides are not adequate to meet water quality standards including full support of desingated uses in Oregon and additional management measures are required.	47	Program-Other
70-G	Herbicides (e.g., Atrazine) can persist in water and can bind with soil particles, so under OR's FPA, pesticides such as atrazine are sprayed into dry channels that become active in wetter months, carrying herbicides downstream to fish.	4	Env - Fish Toxicity, Program Other
76-C	Supports pesticide-free buffers around schools, such as near Triangle Lake.	2	Program - Other (schools, homes)

PROGRAM-ENFORCEMENT

70-L	Evidence suggests that federal label restrictions for Atrazine, an Oregon-regulated herbicide, are not being followed. Also, poor record-keeping on pesticide applications	6	Program - Enforcement, Program - FIFRA
70-M2	There may have been a violation of a 2004 court that required 300' buffers for pesticide application for 2,4-D.	12-15	Program - Enforcement, Program - FIFRA
77-S	Since 1998 there have been significant changes in how chemicals are applied to forests under FIFRA. Findings from the Spray Drift Task Force and other research led to revisions in chemical labeling. Pesticide applicators are licensed under FIFRA and recent court rulings have further increased regulation of applicators and land owners. Oregon’s Forest Practices Act rule guidelines state that applications must comply with the most stringent of requirements of either the label, or forest practice rules and guidelines.	19	Program - State Program; Program - FIFRA; Program - Enforcement; Program - Scope of Authority

Health-related
Comments
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Health-General

Comment Code	Summary Main Comments	Pg. #	Category of Comment
2-D	Forestry use of glyphosate leads to risks of elevated body tissue concentrations.	22	Health - general
2-H	Past assessment of data should be revisited to see if any of it suggests widespread exposures to forestry use herbicides have been affecting human and aquatic residents of our watersheds.	Att 2, p. 8	Health - general
40-B	Spraying and burning also occurs very close to (and over) homes causing health problems within a sole source aquifer and is contaminating drinking water. This should not be allowed.	1	Health - general; Health - drinking water
53-D	Herbicide spraying of logging roads and clear cuts with ensuing run-off intothe water supply are a well-established health risk.	1	Health - General
54-B	OR needs improved pesticides application restrictions and protections for all classes of streams in both forestry and agricultural areas. Additionally, we encourage EPA and NOAA to require even greater pesticide protection standards for all land use areas within the Oregon Coastal Zone to prevent many of the unmonitored dangers that these chemicals pose to humans and aquatic species, like salmon.	1	Program - General; Env - Fish toxicity; Health - general
54-D	Oregon's pesticide laws, forestry management laws, clean water laws, and its implementing regulatory programs fail to adequately protect coastal zone resources and the people living within the coastal zone from the dangers of the increasing use of pesticides across all land uses and activities, but especially in the activities of forestry and agriculture. In the Oregon Coastal Zone, neither FIFRA, nor state pesticides, agricultural, or forestry laws adequately protect or account for these known risks.	3	Program - General; Env - Fish toxicity; Health - general

HEALTH-SAMPLES

2-C	Urine samples in Triangle Lake show citizens with elevated 2,4-D and atrazine metabolites from drift in aerial applications.	18-20	Health - samples
2-F	Investigation of the Triangle Lake (Lane County) human urine elevation of 2/4 D and atrazine metabolites, during times of year considered to be at low risk of persistence in the body, has caused multiagency level of concern	Att 2, p. 7	Health - samples
2-G	Current data is suggestive of widespread human uptake of these compounds [2,4 D and atrazine] and warrants investigation of Forest practices Act BMPs associated with aerial spraying in the coast range	Att 2, p. 7	Health - samples
2-K	Forestry use glyphosate applications in the high risk Oregon coastal mountains lead to risks of elevated body tissue concentrations, yet urine glyphosate is not an additional analyte in investigatory processes.	Att 2, p. 11	Health - samples

59-A	Concerned about pesticide spraying. Secondhand account of citizens in western Lane County that had insecticide show up in blood tests and became ill after pesticide spraying. More needs to be done to protect human health from pesticide exposure. The Physicians for Social responsibility should be of some assistance.	1	Health – Samples	
76-A	Concerned about pesticide spraying. They have tested posititive for pesticide/herbicides even though they run an organic farm.	1	Health-Samples	

HEALTH-DRINKING WATER

3-B	· Notes wildlife and fish just starting to come back. Recent testing of old domestic water supply still shows residual effects.	1	Health-Drinking Water	
27-C	· Need preventive measures to assure that forestry operations near Clear Lake won't make water undrinkable (get drinking water from lake and has observed small-lot foresters aerial and hand spraying pesticides/herbicides near lake.	1	Program-Monitoring, Health-Drinking Water	
28-C	· Concerned about contamination of drinking water (Newport gets water from Siletz), fish and soil contamination from spraying. Criminal that state does not provide better protections..especially as rate of clear cutting/forestry activities increase due to increase in China exports.	1	Health-Drinking Water, Env-Fish, Programs-State Programs	general buffer comment ?
30-G	OR must increase buffers for the application of pesticides to both fish and non-fish bearing streams and take other actions to prevent pesticides from entering water that affects people, fish, and wildlife. Community watersheds are routinely exposed to the timber industry's aerial spraying of toxic pesticides.	3	Program - type N buffers; Program - type F buffers; Health - drinking water	general buffer comment ?
30-P	Oregon riparian buffers for pesticide use are woefully inadequate. Does not agree with EPA/NOAA that Oregon "may" have adequate stream buffers for pesticide use on streams with salmon but is encouraged that NOAA/EPA find that the state doesn't have good buffers on non-fish breaing streams. Most drinking water flows through non-fishbearing streams.	4	Program - type N buffers; Program - type F buffers; Health - drinking water	
30-Q	Oregon's pesticide discharge permit allows spraying forest canopy over water, which will enter drinking water and affect fish and wildlife.	4	Health - drinking water; Env - fish toxicity	
35-L	Thousands of coastal residents currently face the prospect of drinking water laced with fertilizer, pesticides, herbicides and sediment. This is a health risk, as well as being costly for the drinking water suppliers such as Heceta Water District.	5	Health – drinking water	
40-B	Spraying and burning also occurs very close to (and over) homes causing health problems within a sole source aquifer and is contaminating drinking water. This should not be allowed.	1	Health - general; Health - drinking water	
42-F	Because its been clearcut, a lot of spraying has occurred in drinking water watershed. Drinking water had tested positive for glyphosate.	2	Health - drinking water	
46-G	OR needs to protect surface drinking water in Deer Creek Watershed…critical source of water for residents. Keeping aquifers free of toxic chemicals are critical for providing and protecting water for the entire community of the Deer Creek watershed.	6	Health – drinking water	
48-F	Drinking waters are surrounded by private forest land or are below forest operations. 20ft buffers on fish-bearing streams do not protect from sedimentation and pesticide/herbicide use.	2	Health -Drinking Water, Program - Type F Buffers	

48-K	Exposure of drinking water supply to pesticide and herbicide residue is a related common and serious health risk for residents in small towns on the coast.		Health-Drinking Water
53-J	The situation at present is clearly inadequate to prevent potentially disastrous contamination of our drinking water.	3	Health – drinking water
62-B	Concerned with logging impacts from pesticide/herbicide use and habitat "mistreatment". There should be no aerial spraying close to known drinking water sources.	1	Health – drinking water
62-E	There should be no aerial spraying close to known drinking water sources	3	Health – drinking water
70-E	Oregon has inadequate protection of fish-bearing streams and drinking water compared to neighboring states.	3	Health - Drinking Water, Env - Fish Toxicity
70-H	State doesn't have a program to protect groundwater/drinking water.	4	Health - Drinking Water, Program General

HEALTH-CHEMICAL EFFECTS

2-J	Does glyphosate adversely affect intestinal homeostasis, reducing nutrient uptake and contributing to pathogenicity?	Att 2, p. 11	Health - chemical effects
3-A	· Concerned about 2007 overspray on his property and wants us to consider toxic effects.	1	Health-Chemical Effects, Health-Drift
42-M	OHA toxicoligist indicates that limited research about the long term effects of combining these various chemicals.	Att. P.3	Health - chemical effects
42-R	OHA has indicated that higher levels have been found in nearby residents urine when spraying on private timber lands has occurred.	Att. P.4	Health - chemical effects
42-T	It would seem logical and prudent ot err on the side of caution regarding the use of these chemicals, since there are possible unknown health effects on people and other living beings. Also there is no testing for soil contamination during spraying.	Att. P.4	Health - chemical effects; Program - monitoring
46-K	Claims to have visited a doctor who believes Orville's liver and health issues are the result of toxic exposure and agrees that adjacent land pesticides use makes sense. Many costs to family.	5	Health – Chemical Effects (e.g., synergistic, unknown, revolatilization)
54-G2	Specifically 1)There are known endocrine disrupting chemicals entering our drinking water sources and fish-bearing streams.	6	health - Chemical Effects; Env - Fish toxicity;
54-H	Cites environmental and health risks from glyphosate and other pesticides. Also expressed concerns regarding unknown and unmonitored risks of pesticides.	4-5, 7-10	Health - Chemical Effects;

69 - D	Pollutants have been shown to have sub-lethal and synergistic effects that inhibit immune response, and interfere with the ability of birds to forage and defend themselves and their young from predators.	2	Health – Chemical Effects (e.g., synergistic, unknown, revolatilization)
70-D	Unknown risks from synergistic interactions of chemicals mixed together.	2,3	Health - Chemical Effects - Synergistic

HEALTH-DRIFT

2-E	Herbicide drift from aerial spraying during forestry application is a well known phenom in the risk microclimates of the Oregon Coast range	Att 2, p. 7	Health - drift
2-I	It is possible that other forestry use herbicide formulations [other than 2,4 D and atrazine] are also being transported off site to produce unintended exposures.	Att 2, p. 8	Health - drift
3-A	· Concerned about 2007 overspray on his property and wants us to consider toxic effects.	1	Health-Chemical Effects, Health-Drift
42-H	· No monitoring of airial drift of pesticide even when OR Health Admin says can drift for 2-4 miles.	2	Health - drift
42-Q	OHA has indicated that spray applied by helicopter or plan can move two to three miles from the application site.	Att. P.4	Health - drift

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ENVIRONMENTAL - GENERAL

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57-CF-B	Many water bodies have no mandatory application buffer, so chemical may be sprayed to the water's edge, and some level of overspray, indirect drift and delivery by surface runoff by groundwater transport through soil macropores into adjacent waters is inevitable. These include headwater streams above fish barriers and small wetlands and ponds.	53	Env-drift; Program-Type "N" Buffer; Program-Type "F" Buffer; Env-General	
57-CF-E	Some studies have indicated some delivery of chemical residues at low measured concentrations. The Dent study may have underestimated the impacts. The Clackamas Study by USGS shows widespread pesticide residues	54	Env-General;	Study results
69-B	Waters are at risk from pesticides and other toxic chemicals, oil and grease, sediment, salts, excess bacteria and nutrients released from agricultural and timber lands, from roads and urban areas, from construction and mining areas, from eroding stream banks, livestock, and faulty septic systems.	1	Env - General	
70-B	Our comments address the inadequacies of Oregon's existing program to implement the required CZARA management measures, its inability and disinterest in evaluating the sufficiency of those management measures to ensure pesticides do not violate Oregon's water quality standards and impair its designated uses, its lack of a monitoring program to support such an evaluation, and its lack of practices that protect those designated uses.	1	Program - State Programs, Program monitoring, Env-General	
70-C	Beyond Toxics report on pesticide/herbicide use in forestry shows that FPA lacks any program to protect Oregon streams and their beneficial uses (see report attached). Requires no pesticide buffer on non-fish streams even though neighboring states (WA, ID) require 25ft buffers. In non-fish bearing streams, amphibians and crawfish are affected by pesticide application	2	Program - State Programs, Program monitoring, Env-General	
77-R	Water quality monitoring of a type-N (non-fish bearing) forest stream during and after herbicide spray operations (applied under OFPA rules and guidelines and FIFRA/labeling regulations) shows no evidence of detrimental impacts. Nevertheless, Oregon continues to support monitoring that would identify potential problems should they arise. ... Recent monitoring has not found a problem with contemporary forest aerial herbicide spray operations; in fact just the opposite. Oregon is currently monitoring for over 100 pesticides, which will aloow the state to respond should herbicides be identified at unacceptable levels.	19, 21	Env-general	Study Results

ENV-FISH TOXICITY

30-Q	Oregon's pesticide discharge permit allows spraying forest canopy over water, which will enter drinking water and affect fish and wildlife.	4	Health - drinking water; Env - fish toxicity	
54-B	OR needs improved pesticides application restrictions and protections for all classes of streams in both forestry and agricultural areas. Additionally, we encourage EPA and NOAA to require even greater pesticide protection standards for all land use areas within the Oregon Coastal Zone to prevent many of the unmonitored dangers that these chemicals pose to humans and aquatic species, like salmon.	1	Program - General; Env - Fish toxicity; Health - general	

54-D	Oregon's pesticide laws, forestry management laws, clean water laws, and its implementing regulatory programs fail to adequately protect coastal zone resources and the people living within the coastal zone from the dangers of the increasing use of pesticides across all land uses and activities, but especially in the activities of forestry and agriculture. In the Oregon Coastal Zone, neither FIFRA, nor state pesticides, agricultural, or forestry laws adequately protect or account for these known risks.	3	Program - General; Env - Fish toxicity; Health - general	
54-G2	Specifically 1)There are known endocrine disrupting chemicals entering our drinking water sources and fish-bearing streams.	6	health - Chemical Effects; Env - Fish toxicity;	
58-I	Chemicals used by the forest and ag industries have direct adverse effects on listed fish and other organisms.		Env - Fish Toxicity	
70-E	Oregon has inadequate protection of fish-bearing streams and drinking water compared to neighboring states.	3	Health - Drinking Water, Env - Fish Toxicity	
70-G	Herbicides (e.g., Atrazine) can persist in water and can bind with soil particles, so under OR's FPA, pesticides such as atrazine are sprayed into dry channels that become active in wetter months, carrying herbicides downstream to fish.	4	Env - Fish Toxicity, Program Other	
76-D	Pesticides harm salmon.	63-	Env-fish toxicity	

ENV-DRIFT

46-I	Ever growing concern by residents in the Illionois Valley about the use of ODF approved pesticides on forestlands and damages being done to neighboring small organic farmers, vineyard owners, natural forest land owner/practitioners and other community members.	1	Env – Drift (e.g., impacts to non-drinking water)	

ENV-OTHER

46-O	These chemicals do not know property lines. They outgas for years as they decompose. Reside in soil in degraded forms which can be more toxic than the initial compound	7	Env – Other	
57-CF-A	Aerial spraying is of greatest concern because on forest lands, it involves the largest quantities of chemical application over the largest areas.	51	Env-other	Aerial spraying
57-CF-D	Sediment erosion may also provide a vehicle for pesticide delivery into waters.	53	Env - Other	Sediment erosion increases pesticide delivery
69-E	pesticides persist in water and can bind to soil.	2	Env – Other	
70-O	Amphibians that live in streams within clearcuts in the Oregon Coastal Range are in decline and have become a management concern. Amphibians are particularly vulnerable to absorbing toxins since they have moist, permeable skin and unshelled eggs that are directly exposed to soil and water.	2	Env-Other	Fish Toxicity

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ENVIRONMENTAL - GENERAL

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46-J	It appears that little is understood by chemical users of the impacts these chemicals have on their neighbors, adjoining watersheds and the larger community. It seems taken for granted that the laest and instructions of the chemical company is all they need to consider, because that is the legal requirement. The ODF and legal system supports use of harmful chemicals.	2	Legal - Other	
46-P	We have a right to know what are in the chemical compounds, including the inerts. Right to know what is in our air and water and may be causing health conditions such as liver disease, cancer, auto immune and reproductive illnesses. Changing our own and children's DNA.	7	Legal - Other	